



Macarena García Silva  
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**Sent by email**

Date: 09/02/2021

**Subject: Request for variation to the MSC Certification Requirement v2.1 FCP-7.9.1.1 for Mussel raft culture in Galicia (Mejillón de Galicia PDO)**

Dear Macarena García Silva,

I write with reference to your submission on 02/02/2021 of a request for variation to the MSC Certification Requirement (CR) to allow:

The CAB requests that the trace back be to the combined UoCs rather than the individual UoCs.

As you are aware, the CR procedures relating to v2.1 FCP-7.9.1.1 state:

The CAB shall confirm that systems allow the fishery client to trace back to the UoC any fish or fish products sold as MSC certified

These are integral to ensuring all MSC accredited Conformity Assessment Bodies operate in a consistent and transparent manner. The MSC intends that these requirements be met across all fisheries and CoC certificate holders, except in exceptional, well-justified circumstances, as part of the MSC programme.

**MSC notes the factors presented supporting your request, including:**

- The CAB has conducted a risk analysis and confirms that traceability back to the combined UoCs would not be at risk if this VR is accepted.
- The separation between mussels at the time of harvest and transfer of the mussels to the vessel is not commercially feasible due to the practical operation of the fishery that would require significant modification to the existing harvesting and processing methods.

**Given the rationale provided, the MSC is willing to grant a variation to the CR in this case subject to the following conditions:**

- This variation response is only valid if both UoAs are certified.
- This variation shall not be taken as a precedent for similar situations in the future.

If you have any questions regarding this response, please do not hesitate to contact the relevant Fisheries Assessment Manager for this fishery.

Marine Stewardship Council  
cc: Assurance Services International